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REPLY TO MONTCLAIR OFFICE

March 20, 2020

JOINT LETTER-MOTION
TO CONTINUE DATE FOR STATUS CONFERENCE

Filed via ECF

Hon. Naomi Reice Buchwald, Senior U.S.D.J.
Moynihan United States Courthouse
500 Pearl Street
New York, N.Y. 10007

Re: United States v. Tsani Russell, 19-cr-554(NRB)

Dear Judge Buchwald:

This letter is respectfully submitted by undersigned counsel as a joint request by the parties to establish a new date for the next status conference in this case, presently set for March 24 at 2:30pm. The parties jointly request a continuance of approximately 45 days and, if this application is allowed, will work with Your Honor's Deputy Clerk on establishing a date that is convenient to all.

The parties have been engaged in productive discussions of a potential resolution of the case. However, the many exigencies created by the Covid-19 pandemic have made further progress impossible. It remains the goal of counsel to reach a resolution of this case. The defense consents to a waiver of Speedy Trial Act timelines.

The Court's time and attention to this matter are appreciated.

Respectfully yours,
/s/ David A. Ruhnke
David A. Ruhnke (Ruhnke & Barrett)
Diane Ferrone (Law Offices of Diane Ferrone)
Counsel to Tsani Russell

Via ECF: Jeffrey Coffman, A.U.S.A.

The
conference
is
adjourned
until
May 7, 2020
at 2:30pm
Speedy
trial
time is
excluded.
So ordered
Naomi Reice
Buchwald,
USDC
3/23/20